

March 12, 2019

Via ECFS Filing

Ms. Marlene Dortch  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re:    *Updating the Intercarrier Compensation Regime To Eliminate Access Arbitrage, WC  
Docket No. 18-155***

Dear Ms. Dortch:

The Native American Telecom Companies (Native American Telecom, LLC and Native American Telecom – Pine Ridge, LLC) hereby file this letter identifying and explaining an ex parte meeting on March 11, 2019 between Gene DeJordy, President of the Native American Telecom Companies and the following individuals with the Commission: Irina Asoskov, Susan Bahr, Allison Baker, Octavian Carare, Lynne Engledow, Lisa Hone, Richard Kwiatkowski, Albert Lewis, Erik Raven-Hansen, Gil Strobel, and Shane Taylor. During this meeting, the Native American Telecom Companies explained that: (i) they are independent rural carriers serving some of the most rural, low-income areas of the country that lack access to many of the basic necessities of life; (ii) they carry their own traffic, at significant costs, from their tandem in Sioux Falls to their end offices in Pine Ridge (approximately 294 miles) and Fort Thompson (approximately 138 miles), eliminating the need for a CEA provider; and (iii) they have established broadband infrastructures on the Pine Ridge and Crow Creek reservations to facilitate economic development, resulting in, for the first time, access to affordable broadband services and digital literacy training. The Native American Telecom Companies further explained that the remaining levels of intercarrier compensation, which have been significantly reduced or eliminated over the last few years, are absolutely necessary for rural carriers, who

incur significant costs to bring telecommunications services to rural areas – rural areas that have been abandoned or ignored by the larger national carriers.

Any questions concerning this filing should be directed to the undersigned.

Respectfully submitted,



Gene DeJordy, President

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